

MONTGOMERY Y. PAEK, Bar No. 10176
AMY L. THOMPSON, Bar No. 11907
DIANA G. DICKINSON, Bar No. 13477
LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway
Suite 300
Las Vegas, Nevada 89169.5937
Telephone: 702.862.8800
Fax No.: 702.862.8811
Email: mpaek@littler.com
athompson@littler.com
ddickinson@littler.com

Attorneys for Defendants
DIAMOND RESORTS INTERNATIONAL
MARKETING, INC., HILTON GRAND VACATIONS
INC. AND NOAH BLOOM

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LILIANE KELAA,

Plaintiff,

v.

DIAMOND RESORTS INTERNATIONAL,
INC., a Delaware Corporation; HILTON
GRAND VACATIONS INC., a Delaware
corporation as successor-in-interest; NOAH
BLOOM, an individual; DOES I through X,
inclusive; and ROE BUSINESS ENTITIES, I
through X, inclusive,

Defendants.

Case No. 2:22-cv-00554-JAD-BNW

**STIPULATION AND PROPOSED
ORDER TO EXTEND DISCOVERY
DEADLINES**

(FIRST REQUEST)

Pursuant to Local Rule IA 6-1 and Local Rule 26-3, Defendants DIAMOND RESORTS INTERNATIONAL MARKETING, INC. (incorrectly identified as Diamond Resorts International, Inc.), HILTON GRAND VACATIONS INC. AND NOAH BLOOM (collectively referred to as “Defendants”) and Plaintiff LILIANE KELAA (“Plaintiff”) (collectively, the “Parties”), hereby stipulate to amend the Discovery Plan and Scheduling Order (ECF No. 27) by extending the outstanding discovery deadlines for a period of sixty (60) days.

1 This is the first request for an extension to the Discovery Plan and Scheduling Order in this
2 matter. The requested extension is sought in good faith and not for purposes of undue delay. This
3 request is submitted at least twenty-one (21) days or more before the expiration of the subject
4 deadlines.

5 **DISCOVERY COMPLETED**

6 The parties have exchanged their initial disclosures and have begun producing documents.
7 Defendant has produced 299 pages of documents so far in this matter while Plaintiff has produced 52
8 pages. Defendants propounded their First Set of Interrogatories and Requests for Production of
9 Documents on October 7, 2022.

10 **DISCOVERY REMAINING TO BE COMPLETED**

11 Defendants intend to serve third party subpoenas but cannot do so until Plaintiff executes the
12 necessary authorizations and responds to the discovery requests. Defendants will further require the
13 subpoenaed records before it can evaluate whether expert discovery is warranted. Defendants will
14 take Plaintiff's deposition together with any percipient witnesses. Plaintiff also intends to take
15 depositions.

16 **REASONS FOR REQUESTED EXTENSIONS**

17 This extension is necessary to allow both parties ample time to complete all appropriate
18 discovery. Specifically, the expert disclosure deadline is currently on October 28, 2022, however
19 additional time is needed to receive and review discovery responses and send and receive responses
20 to third-party subpoenas before it can be determined whether expert discovery is warranted in this case
21 such that it would not be feasible to do so with the current deadline of October 28, 2022. Further, this
22 matter is set for an Early Neutral Evaluation ("ENE") on October 28 and the parties prefer to
23 participate in the ENE process before engaging in the expense of possible expert discovery. Finally,
24 the parties anticipate needing additional time to take depositions and conduct additional third-party
25 discovery. The Parties believe that, absent any unforeseen circumstances, all necessary discovery can
26 be accomplished by the requested extended deadline. Good cause exists to extend all deadlines in
27 order to permit the parties to achieve their respective stated discovery goals.

28 ///

PROPOSED REVISED DISCOVERY PLAN

1. The Parties' current deadline for Expert Disclosures is October 28, 2022. The Parties request that the Court extend that deadline to December 29, 2022.

2. The Parties' current deadline for Rebuttal Expert Disclosures is November 28, 2022. The Parties request that the Court extend that deadline to January 30, 2023¹.

3. The Parties' current deadline for completing discovery is December 27, 2022. The Parties request that the Court extend that deadline to February 27, 2023².

4. The Parties' current deadline for filing dispositive motions is January 26, 2023. The Parties request that the Court extend that deadline to March 29, 2023.

5. The Parties' current deadline for filing the Joint Pretrial Order is February 25, 2023. The Parties request that the Court extend that deadline to April 28, 2023. In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the Court enters a ruling on the dispositive motions or otherwise by further order of the Court.

The Parties make this stipulation in good faith and not for the purposes of undue burden or delay.

Dated: October 7, 2022
HONE LAW

Dated: October 7, 2022
LITTLER MENDELSON, P.C.

/s/ Kathryn Newman, Esq.
JILL GARCIA, ESQ.
AMY L. HOWARD, ESQ.
KATHRYN NEWMAN, ESQ.

/s/ Diana G. Dickinson, Esq.
MONTGOMERY Y. PAEK, ESQ.
AMY L. THOMPSON, ESQ.
DIANA G. DICKINSON, ESQ.

Attorneys for Plaintiff
LILIANE KELAA

Attorneys for Defendants
DIAMOND RESORTS INTERNATIONAL
MARKETING, INC., HILTON GRAND
VACATIONS INC. AND NOAH BLOOM

IT IS SO ORDERED.

Dated: October 11, 2022


UNITED STATES MAGISTRATE JUDGE

4855-7603-4871.2 / 104088-1025

¹ Original deadline lands on Saturday, January 28, 2023, moved to following Monday.

² Original deadline lands on Saturday, February 25, 2023, moved to following Monday.